

Sanga, Ravi

From: Sanga, Ravi
Sent: Friday, July 10, 2015 9:55 AM
To: 'Ernst, William D'; 'Dyer, Miles'
Cc: Daniel Balbiani; Dee Gardner; Tom Colligan; Bartus, Dave
Subject: RE: JFOS SSP Decontamination Work Plan

Will and Miles – EPA has reviewed the latest version of the JFOS SSP Decontamination Workplan and has the remaining comments below:

For the sandy material, Boeing is electing to perform a "measurement-based decontamination" under 761.79(b). Boeing and Jorgensen are proposing a "clean debris surface" performance standard instead of the "near-white blast cleaned surface" or NACE Visual Standard 2 specified at 761.79(b)(3)(i)(B). To be completely rigorous in documenting the ARARs and how compliance with them is achieved, EPA is approving the alternate decontamination standard being proposed based on a finding under 761.79(h)(1) and the facility has "demonstrate[d] that the proposed method is capable of decontaminating the material to the applicable level set out in paragraphs (b)(1) through (b)(4) of this section." Given that the Respondents are cleaning rusty sheet pile, EPA concurs that the Respondents have made this demonstration. Also, Attachment A references Visual Standard 2, which is inconsistent with the "clean debris surface" documented in the letter itself. This needs to be fixed in the final submission. EPA does not agree that the respondents can meet the Visual Standard 2 for the sheet pile given surface corrosion, attachment A must be edited to reference the "clean debris surface" standard instead of the Visual Standard 2).

The proposed decontamination of the dark stains is fully consistent with the TSCA regulations.

Lastly, information at

<http://www.envirosources.com/domino/thielen/envsrc.nsf/SearchAll/0B31E9CD3158410B862564DE007E9FC1?OpenDocument> states that "Surface temperatures below 40 degrees Fahrenheit and above 100 degrees Fahrenheit can reduce extraction efficiency." Even if Seattle weather cools down a bit, it will be very easy to get surface temperatures on the rusty sheet pile well above 100F. This must be noted.

Should you have any questions, please contact me. I am in the office all next week, so if the above changes are acceptable to Boeing and Jorgensen, we can expeditiously approve the final decontamination work plan.

Ravi

From: Ernst, William D [mailto:william.d.ernst@boeing.com]
Sent: Wednesday, July 08, 2015 5:30 PM
To: Sanga, Ravi; Bartus, Dave
Cc: Dyer, Miles; Daniel Balbiani; Dee Gardner; Tom Colligan
Subject: JFOS SSP Decontamination Work Plan

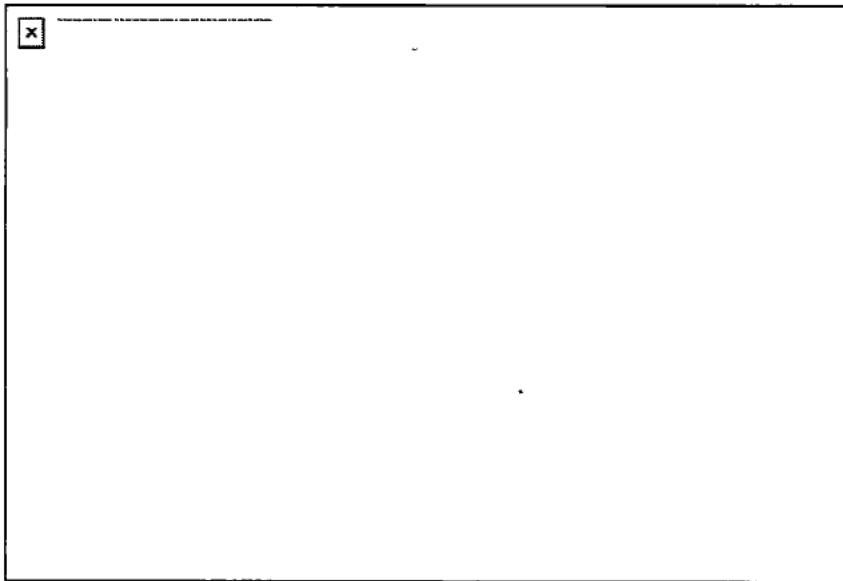
Ravi,

For reasons noted below Miles and I are submitting the Final SSP Decontamination Plan (see attached) that fully incorporates your comments dated June 25, 2015 on the draft. Our signatures on page 4 are provided as a separate pdf file. Although you and we had assumed the plan for SSP decontamination would be an attachment to the full plan required by the 3rd Modification, we request that you separately review and approve the SSP decontamination action, ideally by July 17(b) (6).

We request your approval for the following reasons:

1. The draft SSP Decontamination Work Plan is now final and otherwise ready for implementation; there is no operational reason to delay the work involved.
2. Inclusion of the SSP Decontamination Work Plan as part of the overall plan due to you as a draft on August 17 would delay the approval of this part of the work.
3. Preparing the decontamination area, handling the SSP, managing waste materials generated during decon, and cleaning up the decon area itself should be done in dry weather.
4. Waiting for approval of the entire plan would delay this particular action to less favorable weather conditions.
5. We want to perform the SSP decontamination in a timely and safe manner. This SSP decontamination work can be most safely done in the present weather conditions, and timely completing the work allows it to be completed during a period without interfering with other elements of the larger 3rd Modification work that will follow.
6. The SSP is necessary to define, contain, and support the JFOS Upland excavation. The SSP must be decontaminated to be suitable for use.

Your response and timely approval of this part of the work is requested. With your timely approval of the SSP Decontamination Work Plan, we will be able to initiate the on-site decontamination activities within six months of the March 17, 2015 Action Memorandum. We have prepared the following estimated timeline for activities involving the SSP decontamination and following SSP installation. On-site activities would begin prior to September 17, 2015 with the onset of the SSP decontamination work, and the SSP installation would occur in the winter following your approval of the final full Work Plan, which is needed to authorize preparation of the final detailed design drawings and contracting and mobilization steps.



This timeline is provided for your consideration and feedback now – before we include it in more draft form in the Work Plan due to you August 14.

Miles and I are generally available Wednesday afternoon and most of Thursday and Friday next week to discuss. A phone call meeting could be arranged sooner. Please don't hesitate to email or call. We look forward to your reply, thank you.

Will Ernst
EO&T | EHS | Remediation
d 206.662.1752